

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

KEVIN & CRYSANNE CLAY,)	
)	
)	
Plaintiffs,)	
)	
v.)	C.A. No: 10-0986
)	
BANK OF AMERICA, N.A., <i>et al.</i> ,)	
)	
Defendants.)	

MOTION FOR ADMISSION *PRO HAC VICE* OF BRUCE S. LUCKMAN, ESQ.

THE UNDERSIGNED, Timothy P. Creech, pursuant to Local Rule of Civil Procedure 83.2(B), and as a member of the Bar of the United States District Court for the Western District of Pennsylvania, respectfully moves that Bruce S. Luckman, an attorney with the law firm of Kogan, Trichon & Wertheimer, PC, 1818 Market Street, 30th Floor, Philadelphia, Pennsylvania, 9103, be admitted to appear and practice in this Court in this case as counsel *pro hac vice* for Defendant Trans Union LLC (“Trans Union”). In support of this motion, I state:

1. Bruce S. Luckman is a shareholder in the law firm Kogan, Trichon & Wertheimer, P.C., located at 1818 Market Street, 30th Floor, Philadelphia, PA 19103. Mr. Luckman is a resident of the Commonwealth of Pennsylvania, and a member in good standing of, *inter alia*, the Bars of the Supreme Court of Pennsylvania, of the United States District Courts for the Eastern and Middle Districts of Pennsylvania, and of the United States Court of Appeals for the Third Circuit. *See*, Declaration of Bruce S. Luckman attached as Exhibit “A”.

2. Mr. Luckman is a member of the bar in good standing in every jurisdiction in which he has been admitted to practice.

3. There are no disciplinary proceedings pending against Mr. Luckman in any jurisdiction in which he is admitted to practice.

4. Mr. Luckman has certified that he has read, knows, and understands the local rules of the United States District Court for the Western District of Pennsylvania.

WHEREFORE, Trans Union respectfully requests that this Court enter an Order admitting Bruce S. Luckman, *pro hac vice* in this action.

Respectfully submitted,

KOGAN, TRICHON & WERTHEIMER, P.C.

/s/ Timothy P. Creech

TIMOTHY P. CREECH

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Counsel for Defendant, Trans Union LLC

DATED: November 18, 2010

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KEVIN CLAY, <i>et ux.</i> ,)	
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BANK OF AMERICA, N.A., <i>et al.</i> ,)	
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Defendants.)	

CERTIFICATE OF SERVICE

TIMOTHY P. CREECH, Esq., hereby certifies that he caused a true and correct copy of the foregoing Trans Union LLC's **Motion for Admission *Pro Hac Vice* of Attorney Bruce S. Luckman** to be sent on this date, *via* the Court's ECF Notice System, to the following:

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Counsel for Plaintiff

/s/ Timothy P. Creech
TIMOTHY P. CREECH

DATED: November 18, 2010

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ORDER

AND NOW this day of , 2010 upon
review of the foregoing Motion For Admission Of Bruce S. Luckman, Esq. To appear *pro hac*
vice, it is hereby **ORDERED, ADJUDGED, AND DECREED** that Defendant's Motion be
and the same hereby is **GRANTED**.

J.

CERTIFICATE OF BRUCE S. LUCKMAN, ESQUIRE IN SUPPORT
OF MOTION FOR ADMISSION PRO HAC VICE

I, Bruce S. Luckman, hereby certify that:

1. I am a shareholder in the law firm of Kogan, Trichon & Wertheimer, PC, located at 1818 Market Street, 30th Floor, Philadelphia, PA 19103.

2. I am admitted to practice before, and am a member in good standing of the bars of Supreme Courts of Pennsylvania and Connecticut, of the United States District Courts for the Eastern and Middle Districts of Pennsylvania, and of the United States Court of Appeals for the Third Circuit.

3. I have not been censured, suspended, disciplined or disbarred by any court. In addition, no disciplinary action, contempt, or other proceeding is pending before any court.

4. I am regional counsel for Trans Union LLC and, for more than fifteen (15) years, I have represented Trans Union in matters arising under the federal Fair Credit Reporting Act, 15 U.S.C. §1681, *et seq.*, such as the instant action. I am wholly familiar with the above-captioned action.

5. I have read and understand the local rules of the United States District Court for the Western District of Pennsylvania and agree to comply with those rules.

I declare under penalty of perjury of the laws of the United States that the foregoing is correct.

/s/ Bruce S. Luckman
BRUCE S. LUCKMAN